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Attorneys for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and the Estate of Bernard L. Madoff

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

SUSAN SCHEMEN FRADIN REVOCABLE AGREEMENT OF TRUST DATED 5/23/2000 and

SUSAN SCHEMEN FRADIN, individually, as

No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04525 (SMB)

beneficiary and as trustee of the Susan Schemen Fradin Revocable Agreement of Trust Dated 5/23/2000,

Defendants.

CASE MANAGEMENT NOTICE

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the "Order") [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

- 1. The Initial Disclosures shall be due on June 20, 2014.
- 2. Fact Discovery shall be completed on or before February 19, 2015.
- 3. The Deadline for Service of Substantive Interrogatories shall be November 21, 2014.
- 4. The Disclosure of Case-in-Chief Experts shall be due on May 20, 2015.
- 5. The Disclosure of Rebuttal Experts shall be due on June 19, 2015.
- 6. The Deadline for Completion of Expert Discovery shall be September 17, 2015.
- 7. The Deadline for Service of a Notice of Mediation Referral shall be November 16, 2015.
- 8. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be November 30, 2015.

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9. The Deadline for Conclusion of Mediation shall be March 29, 2016.

Dated: New York, New York April 24, 2014

By: <u>s/_Marc E. Hirschfield</u>

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